LAW OFFICES

MILES & STOCKBRIDGE P.C.

10 LIGHT STREET

BALTIMORE, MARYLAND 21202-1487

CAMBRIDGE, MD
COLUMBIA, MD
EASTON, MD
FREDERICK, MD

TELEPHONE 410-727-6464 FAX 410-385-3700 McLEAN, VA
ROCKVILLE, MD
TOWSON, MD
WASHINGTON, D.C.

STEVEN D. FRENKIL 410-385-3758

December 27, 2000

Via Hand Delivery

The Honorable Benson E. Legg United States District Judge United States District Court for the District of Maryland Room 340 Garmatz Federal Court House 101 West Lombard Street Baltimore, Maryland 21201

Re: Kenneth Koehler v. S & S Management Services, Inc.

Civil Action No. L-00-2737

Dear Judge Legg:

I am authorized to write this letter on behalf of counsel for both parties.

We are writing to jointly request a sixty day extension of the discovery deadline from February 22, 2001 to April 23, 2001. The parties commenced discovery in a timely manner, but the process of gathering information has taken longer than expected.

Therefore, we respectfully request the additional sixty days to complete discovery and request that all other deadlines in the Scheduling Order be extended for the same length of time. No date for a Scheduling Conference or Trial had been established in the Pretrial Order.

Thank you very much for your consideration of this request.

Very truly yours,

Steven D. Frenkil

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cc: Martin E. Wolf, Esquire, Counsel for Plaintiff MOTION " (Tean Let

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